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Attorneys for Defendant
BROWNSTEIN HYATT FARBER
SCHRECK LLP

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

FRESH MIX, LLC,

Plaintiff,

vs.

PISANELLI BICE, PLLC, a Nevada Law Firm
and Professional Limited Liability Company,
JAMES P. PISANELLI, ESQUIRE, an
individual, DEBRA L. SPINELLI, ESQUIRE, an
individual, AVA SCHAEFER, ESQUIRE, an
individual, COHEN DOWD QUIGLEY PC, an
Arizona Law Firm and Professional Corporation,
RONALD J. COHEN, an individual, BETSY
LAMM, an individual, DANIEL QUIGLEY, an
individual, JENNA BROWNEE, an individual,
BRUCE A. LESLIE, CHTD, A Nevada Firm,
BRUCE A. LESLIE, an individual;
BROWNSTEIN HYATT FARBER SCHRECK
LLP; a Colorado Limited Liability Partnership;
SAMUEL A. SCHWARTZ, an individual, and
SCHWARTZ LAW, PLLC, and ZACHARIAH
LARSON, an individual, and LARSON &
ZIRZOW, LLC,

Defendants.

Case No. 2:24-cv-00397-JCM-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR REPLY TO
PLAINTIFF'S RESPONSE TO
DEFENDANT BROWNSTEIN HYATT
FARBER SCHRECK LLP'S MOTION
TO DISMISS AMENDED COMPLAINT**

(FIRST REQUEST)

1 In accordance with Local Rules 7-1 and IA 6-1, Defendant Brownstein Hyatt Farber Schreck
2 LLP (“BHFS”) and Plaintiff Fresh Mix, LLC (“Fresh Mix”) stipulate and agree as follows:

3 1. On May 3, 2024, BHFS filed its Motion to Dismiss Fresh Mix’s Amended Complaint
4 [ECF No. 46] (the “Motion to Dismiss”);

5 2. On May 17, 2024, Fresh Mix filed its Opposition [ECF No. 71] to the Motion to
6 Dismiss;

7 3. Presently, BHFS has until May 24, 2024, to file its Reply;

8 4. Good cause exists for BHFS to obtain additional time to file its Reply. Specifically,
9 BHFS’s counsel has existing work-related scheduling conflicts, including work associated with
10 depositions in a state court matter, work for two different clients in pending State Bar disciplinary
11 matters, preparing expert testimony for another client in a State Bar disciplinary matter, and briefing
12 on a lien adjudication motion for a client in a state court matter. Further, given the number of
13 exhibits filed by Fresh Mix with its Opposition to the Motion to Dismiss, together with the number
14 of exhibits filed by Fresh Mix with its Oppositions to other Motions to Dismiss, BHFS’s counsel
15 needs additional time to prepare its Reply;

16 5. Under these circumstances, and as a matter of professional courtesy, BHFS shall have
17 until June 4, 2024 to file its Reply; and

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6. This is the first request to extend the deadline for BHFS to file its Reply to the Opposition to its Motion to Dismiss and is sought in good faith and not for purposes of delay.

Dated this 23rd day of May, 2024.

Dated this 23rd day of May, 2024.

BAILEY ♦ KENNEDY

LAW OFFICE OF MATTHEW L. SHARP

By: /s/ Joshua P. Gilmore

By: /s/ Matthew L. Sharp

DENNIS L. KENNEDY

MATTHEW L. SHARP (Bar No. 4746)

JOSHUA P. GILMORE

- and -

REBECCA L. CROOKER

Attorneys for Defendant

STEVEN K. EISENBERG (*pro hac vice*)

BROWNSTEIN HYATT FARBER

STERN & EISENBERG, P.C.

SCHRECK LLP

Attorneys for Plaintiff

FRESH MIX, LLC

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

Dated: May 24, 2024